

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

Autoscribe Corporation,

Plaintiff,

v.

Nuvei Corporation, Nuvei Technologies
Corporation, and Nuvei Technologies, Inc.,

Defendants.

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Civil Action No. 2:24-cv-325

JURY TRIAL DEMANDED

**DECLARATION OF VERONIQUE PIERCEY IN SUPPORT
OF NUVEI CORPORATION, NUVEI TECHNOLOGIES CORP.,
AND NUVEI INTERNATIONAL GROUP LIMITED'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

1. I am Senior Corporate Paralegal with Nuvei Technologies Corp. on secondment to Nuvei (Netherlands) BV, and I submit this declaration in support of Nuvei Corporation, Nuvei Technologies Corp., and Nuvei International Group Limited's Motion to Dismiss for Lack of Personal Jurisdiction. Unless indicated otherwise, I have personal knowledge of the facts contained in this declaration, and, if called upon to do so, I could and would testify competently to the matters set forth therein.

2. Nuvei Corporation is a corporation organized under the laws of Canada with its principal place of business at 1100 René-Lévesque Boulevard West, 9th Floor, Montreal, Quebec, Canada, H3B 4N4.

3. Nuvei Technologies Corp. is a corporation organized under the laws of Canada with its principal place of business at 1100 René-Lévesque Boulevard West, 9th Floor, Montreal, Quebec, Canada H3B 4N4.

4. Nuvei Corporation is a holding company that is the parent company of Nuvei Technologies Corp. Nuvei Technologies Corp. is the indirect parent of Nuvei Limited, and Nuvei International Group Limited.

5. Nuvei Corporation's main business is to own its subsidiaries. Nuvei Corporation, however, does not control or direct any of the various activities of Nuvei Technologies Corp., Nuvei Limited, or Nuvei International Group Limited.

6. Nuvei Technologies Corp. does not control or direct any of the various activities of Nuvei Limited, or Nuvei International Group Limited.

7. Nuvei Corporation's only place of business is in Canada. Nuvei Corporation does not have any places of business in the Eastern District of Texas or elsewhere in the United States.

8. While Nuvei Corporation is a publicly traded corporation and files appropriate filings with registering organizations, Nuvei Corporation is not an operating company, and as a result does not provide services in the United States. Nuvei Corporation does not contract with any customers in the United States, including the Eastern District of Texas.

9. Nuvei Technologies Corp.'s principal place of business is in Canada. Nuvei Technologies Corp. does not have any places of business in the Eastern District of Texas or elsewhere in the United States.

10. Nuvei Technologies Corp.'s business activities are undertaken in Canada, not the United States. Nuvei Technologies Corp. does not seek out or contract with any customers in the United States, including the Eastern District of Texas.

11. Nuvei Corporation is not registered to do business in the United States, including the state of Texas. Nuvei Corporation does not have accounts or telephone listings in Texas. Nuvei Corporation has no property or facilities in Texas. Nuvei Corporation pays no taxes in Texas.

12. Nuvei Technologies Corp. is not registered to do business in the United States, including the state of Texas. Nuvei Technologies Corp. does not have accounts or telephone listings in Texas. Nuvei Technologies Corp. has no property or facilities in Texas. Nuvei Technologies Corp. pays no taxes in Texas.

13. Neither Nuvei Corporation nor Nuvei Technologies Corp. employs any personnel in Texas or the United States.

14. Neither Nuvei Corporation nor Nuvei Technologies Corp. conduct corporate meetings in Texas or the United States. Neither Nuvei Corporation nor Nuvei Technologies Corp. maintain corporate files in Texas or the United States.

15. Nuvei International Group Limited is a corporation organized under the laws of Guernsey.

16. Nuvei International Group Limited is an inactive holding company that is a subsidiary of Nuvei Technologies Corp and the parent company of Nuvei Limited. Neither Nuvei Corporation nor Nuvei Technologies Corp. controls or directs any of the various activities of Nuvei International Group Limited. Nuvei International Group Limited does not control or direct any of the various activities of Nuvei Limited.

17. Nuvei International Group Limited does not have any places of business in the Eastern District of Texas or elsewhere in the United States.

18. Nuvei International Group Limited does not seek out or contract with any customers in the United States, including the Eastern District of Texas.

19. Nuvei International Group Limited is not registered to do business in the United States, including the state of Texas. Nuvei International Group Limited does not have accounts or telephone listings in the United States, including the state of Texas. Nuvei International Group

Limited has no property or facilities in the United States, including the state of Texas. Nuvei International Group Limited pays no taxes in the United States, including the state of Texas.

20. Nuvei International Group Limited does not employ any personnel in the United States, including the state of Texas.

21. Nuvei International Group Limited does not conduct corporate meetings in the United States, including the state of Texas. Nuvei International Group Limited does not maintain corporate files in the United States, including the state of Texas.

22. Nuvei Corporation, Nuvei Technologies Corp., Nuvei Limited, and Nuvei International Group Limited are separate entities, and corporate formalities are maintained. In that regard, Nuvei Corporation and Nuvei Technologies Corp. maintain each maintain separate books and records, separate bank accounts, and separate assets from each other and both Nuvei Limited and Nuvei International Group Limited.

23. On November 28, 2024, Nuvei Corporation and Nuvei Technologies Corp. merged into a single entity called “Nuvei Corporation” and were reorganized under a new top entity. At such time, corporate books, records, accounts, and assets were merged between the two entities. Nuvei Limited and Nuvei International Group Limited remain separate entities.

24. Paragraphs 1-22 above were also true as of May 3, 2024, which I understand is the date the Complaint in this action was filed and November 11, 2024, which I understand is the date the Amended Complaint in this action was filed.

I declare under penalty of perjury the laws of the United States of America that the foregoing is true and correct. Executed this December 2, 2024 in Valletta, Malta.

A handwritten signature in black ink, appearing to be 'V. Piercey', is written over a horizontal line.

Veronique Piercey